

1 J.T. Fox, Esq., SBN 195063

2 **LAW OFFICES OF J.T. FOX & ASSOCIATES,  
A Professional Corporation**

3 556 S. Fair Oaks Ave., No. 444  
4 Pasadena, CA 91105  
5 (888) 750-5530 Work  
(888) 750-5530 Fax

6 Attorney for Defendants/Counterclaimants,

7 Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC

8

9 **UNITED STATES DISTRICT COURT**

10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 HIDDEN EMPIRE HOLDINGS, LLC; a  
13 Delaware limited liability company; HYPER  
14 ENGINE, LLC; a California limited  
liability company; DEON TAYLOR, an  
15 individual,

16 Plaintiffs,

17 v.

18 DARRICK ANGELONE, an individual;  
19 AONE CREATIVE LLC, formerly known  
as AONE ENTERTAINMENT LLC, a  
20 Florida limited liability company; and ON  
CHAIN INNOVATIONS LLC, a Florida  
21 limited liability company,

22 Defendants.

Case No. 2:22-cv-06515-MWF-AGR

*Assigned to the Hon. Judge Michael W.  
Fitzgerald*

**DEFENDANTS' MOTION IN LIMINE  
#3 TO PRECLUDE UNPRODUCED  
DIGITAL AUDIT LOGS,  
SCREENSHOTS, AND RELATED IP  
DATA**

Pretrial Conference: December 22, 2025

Trial Date: January 13, 2026

Time: 8:30 AM

Dept.: 5A

1 COMES NOW, Defendants and Counterclaimants DARRICK ANGELONE, AONE  
2 CREATIVE, LLC and ON CHAIN INNOVATIONS, LLC (collectively, “AONE”), by and  
3 through their attorneys of record, and submit this Motion in Limine No. 3 to preclude  
4 Plaintiffs, their counsel, and their witnesses from offering or referring at trial to  
5 unproduced or incomplete digital audit logs, screenshots, IP address attributions, and  
6 related communications, including the October 10, 2022 Google Workspace “admin audit  
7 log” screenshot and associated IP address relied upon by Plaintiffs’ expert Erin Burke.

8 This Motion is made pursuant to Federal Rules of Civil Procedure 26 and 37(c)(1)  
9 and Federal Rules of Evidence 106, 401, 403, 702, 703, 901, and 1002, the Court’s  
10 February 14, 2023 Order re Jury Trial, and all pleadings and papers on file, including the  
11 Court’s July 17, 2024 Order denying Plaintiffs’ motion for terminating sanctions regarding  
12 the Google Workspace and the August 19, 2025 Order denying Plaintiffs’ motion for  
13 partial summary judgment. AONE respectfully requests that the Court grant this Motion  
14 for the reasons set forth below.

15 **I. INTRODUCTION**

16 This Motion targets a discrete category of technical proof: digital logs, screenshots,  
17 and communications that Plaintiffs and their experts wish to use as affirmative evidence at  
18 trial but that were never produced in native or complete form in discovery. In particular,  
19 this Motion seeks to exclude:

20 (1) **The October 10, 2022 Google Workspace admin console screenshot** that  
21 Ms. Burke labels “Figure 1 Angelone IP logged into HEFG Workspace and disabling R.A.  
22 Taylor’s account,” reproduced as Exhibit 19 to her February 5, 2024 sanctions declaration  
23 and again as Exhibit 19 to her June 9, 2025 summary-judgment declaration, and any  
24 similar screenshots or demonstratives. In that figure, the Google Admin “Audit and  
25 investigation” view lists events for user “roxanne@hiddenempirefilmgroup.com” on  
26 October 10–11, 2022 in **the new HEFG Workspace**, including entries such as “Roxanne  
27 Taylor logged in,” “Roxanne Taylor has changed Account password,” “Roxanne Taylor  
28 was presented with login verification,” “Roxanne Taylor failed to login,” and one entry

1 truncated as “Account roxanne@hiddenempirefilmgroup.com dis[abled].” An “IP”  
2 column shows an IPv6 address ending in “...ab97:3f8d” for some entries. The screenshot  
3 does not show any “delete Workspace” event, does not identify any acting admin user, and  
4 does not state that the disable event was executed from that IPv6 address. Nonetheless,  
5 Ms. Burke captions it as proof that “Angelone’s IP” logged in and disabled Ms. Taylor’s  
6 account. As discussed below, the technical record distinguishes between (a) tenant-level  
7 actions controlled by Google (e.g., suspension or removal of a Workspace), and (b)  
8 user-level events such as a single mailbox being disabled. The October 10 screenshot,  
9 even if authentic, concerns only the latter in a new Workspace environment—not any  
10 deletion of the historical Workspace tenant or its historical documents. Treating this  
11 cropped image as proof that “Angelone deleted Workspace” is a conflation of distinct  
12 technical events.

13       (2) **The underlying Google Workspace “Admin audit logs” for the new**  
14 **HEFG Workspace** that Ms. Burke repeatedly describes as the “authoritative source” for  
15 her opinions but concedes “have not been produced.” In responses to AONE’s specific  
16 Requests for Production seeking “all documents or ESI which evidence, refer, or relate to  
17 the Google Workspace admin console and audit log showing login from Angelone’s IP  
18 address on October 10, 2022, and the disabling of Roxanne Taylor’s user account,  
19 attached as Exhibit ‘19’ to the Declaration of Erin Burke dated June 9, 2025,” Plaintiffs  
20 admitted they have “no responsive unproduced documents in [their] possession, custody  
21 or control.”

22       (3) **Any Meta/Facebook/Instagram or X/Twitter admin or Business Suite**  
23 **logs, “log exports,” or internal log screenshots** that were not produced in discovery but  
24 that appear on Ms. Burke’s materials-considered lists or are described in her reports and  
25 declarations. Plaintiffs’ RFP responses admit that they have no Facebook Business Suite  
26 logs, no Facebook Page logs for the HEFG-related pages, and no similar native  
27 social-media audit logs, despite alleging that AONE changed passwords and interfered  
28 with those accounts.

(4) **Unproduced emails, text messages, and messaging-app communications** that Plaintiffs and their experts rely upon in declarations and reports but did not produce as full threads or in native form—such as underlying message chains referenced in FTI/Burke exhibits and .msg files. For example, when AONE requested native versions and full threads for the October 11, 2022 Twitter suspension correspondence (Burke Ex. 26), Plaintiffs again responded that they had no responsive unproduced documents. Likewise, Roxanne Taylor refused to produce any native iMessage threads with Mr. Angelone from 2016 to present, objecting only and producing no native text data.

**(5) Any unproduced forensic work product used to correlate IP addresses to Mr. Angelone or alleged aliases**—including Cellebrite projects, spreadsheets, and analyst notes reflecting IP correlations (such as IPv4 address 76.167.147.254 or IPv6 address 2603:8000:df00:988f:90b8:f0ce:ab97:3f8d) that Plaintiffs’ experts invoke in their attribution theories. In response to RFPs seeking “all Cellebrite project files” and “all analyst notes” tying IP addresses to Mr. Angelone or “Jacky Jasper,” Plaintiffs again stated they had no responsive unproduced documents.

AONE does **not** seek to exclude the third-party subpoena returns from Google, X/Twitter, Instagram, Namecheap, Charter, or other vendors that were produced in discovery and are equally available to both sides. Nor does this Motion ask the Court to take Workspace deletion or social-media tampering issues away from the jury. It asks only that Plaintiffs be barred from proving serious accusations of “deletion,” “hacking,” or “lockouts” with unseen logs, partial screenshots, and undisclosed IP-correlation work product they did not produce in discovery.

This Motion is intended to be fully consistent with the Court’s February 14, 2023 Order re Jury Trial, which directs that motions in limine “address specific issues (e.g., not ‘to exclude all hearsay’)” and not be disguised summary adjudication. AONE seeks a targeted evidentiary ruling enforcing basic discovery fairness, authentication, and reliability requirements.

1           **II. RELEVANT GOOGLE WORKSPACE AND DOMAIN TRANSFER**  
2           **CONTEXT**

3           The limited probative value of the October 10, 2022 screenshot must be evaluated  
4 against the undisputed Workspace/domain timeline already in the record:

5           **August 2, 2022 – Notice of Transfer and Service Discontinuation.** Angelone  
6 emailed HEFG’s Sean Miller that “accounts are being closed out and where necessary set  
7 up for transfer,” expressly referencing a “current balance” and explaining that AONE’s  
8 Workspace services were being discontinued and that HEFG would need to stand up its  
9 own email server going forward; Miller responded “copy.”

10           **August 9–16, 2022 – Temporary Billing Suspension, Then Restoration.**  
11 AONE disabled Workspace services for nonpayment on August 9 and restored services on  
12 August 16. AONE has consistently described this as an administrative billing suspension;  
13 there is no evidence that any data was deleted as part of this process.

14           **September 6–28, 2022 – Google Admin Privileges Dispute; Plaintiffs Using New**  
15 **Email.** Google revoked Angelone’s admin privileges on September 6, 2022 following a  
16 dispute Angelone understood to be initiated by HEFG. He repeatedly contacted Google’s  
17 Account Recovery Team on September 7, 13, and 28 seeking restoration. During the same  
18 period, test emails to [sean@hiddenempirefilmgroup.com](mailto:sean@hiddenempirefilmgroup.com) generated an autoreply stating  
19 that the HEFG Google address was “no longer active” and directing senders to  
20 “[hiddenempirefilm@gmail.com](mailto:hiddenempirefilm@gmail.com),” showing Plaintiffs were already forwarding  
21 correspondence to a new Gmail account.

22           **September 30, 2022 – Preliminary Injunction and Compliance Order.** The  
23 Court issued its preliminary injunction and compliance directions regarding domains,  
24 Workspace, and social-media accounts.

25           **October 3–6, 2022 – FTI Coordination; Domain and Website Data Transfer.**  
26 Angelone met with Plaintiffs’ transfer vendor, FTI Consulting, and agreed to transfer  
27 domains into a new HEFG Namecheap account created by FTI. By October 4, FTI  
28 confirmed that ownership of [hiddenempirefilmgroup.com](http://hiddenempirefilmgroup.com) and [hiddenempirefilms.com](http://hiddenempirefilms.com) had

1 been transferred to the Namecheap account “roxanneavent,” and that passwords for  
2 Twitter and Instagram accounts and admin access to Facebook pages had been provided.  
3 By October 6, all website data for hiddenempirefilmgroup.com had been transferred to  
4 FTI.

5 • **October 11, 2022 – FTI Confirms Plaintiffs’ Full Workspace Control.**

6 FTI confirmed that HEFG had “full, exclusive control” of the Google Workspace  
7 account as of October 11, 2022.

8 Separately, the Google Workspace audit logs produced in the sanctions process—  
9 covering activity from May 11 through October 7, 2022—contain no admin-driven “delete  
10 Workspace” event attributable to any account associated with Angelone; the logs simply  
11 stop after October 7, consistent with Google shutting down the old tenant, not with any  
12 user-executed deletion. The Court, after an evidentiary hearing, credited defense expert  
13 Rick Watts’s conclusion that there is no direct log evidence tying Angelone to a delete-  
14 Workspace event and denied Plaintiffs’ motion for terminating sanctions on that basis.

15 Against this backdrop, the only log data with any bearing on the alleged deletion of  
16 the historical Workspace tenant are the subpoenaed Google logs through October 7, which  
17 both sides possess; and the October 10 screenshot concerns later user-level events in a  
18 new HEFG Workspace environment at a time when domain ownership and Workspace  
19 control were being transferred to, and then confirmed in, Plaintiffs and their vendor FTI.

20 Using that screenshot—which shows, at most, that the  
21 roxanne@hiddenempirefilmgroup.com account was disabled in the new tenant—as proof  
22 that “Angelone deleted Workspace” or “erased all HEFG data” improperly conflates  
23 tenant-level actions (which only Google can execute) with user-level mailbox events. That  
24 conflation is central to why the screenshot is both misleading and unfairly prejudicial.

25 **III. LEGAL ARGUMENT**

26 **A. Rules 26 and 37(c)(1) Bar Plaintiffs from Using Unproduced Logs and  
27 Communications at Trial**

1 Rule 26(a)(1)(A)(ii) requires a party to provide “a copy—or a description by  
2 category and location—of all documents, electronically stored information, and tangible  
3 things” it may use to support its claims or defenses. For testifying experts, Rule  
4 26(a)(2)(B) requires disclosure of all “facts or data considered” in forming opinions, and  
5 Rule 26(e) imposes a continuing duty to supplement.

6 Rule 37(c)(1) provides that if a party fails to provide information or identify a  
7 witness as required by Rule 26(a) or (e), “the party is not allowed to use that information  
8 or witness to supply evidence on a motion, at a hearing, or at trial,” unless the failure was  
9 substantially justified or harmless. The Ninth Circuit has repeatedly held that this  
10 exclusion sanction is “self-executing” and “automatic.” See, e.g., *Yeti by Molly, Ltd. v.*  
11 *Deckers Outdoor Corp.*, 259 F.3d 1101, 1106–07 (9th Cir. 2001); *Ollier v. Sweetwater*  
12 *Union High Sch. Dist.*, 768 F.3d 843, 861 (9th Cir. 2014).

13 Here, Plaintiffs seek to use unproduced Google admin audit logs and social-media  
14 admin logs—and expert opinions expressly premised on those logs—without producing  
15 the underlying records to AONE or Mr. Watts despite targeted discovery requests:

16 **Google Workspace admin audit logs.**

17 Ms. Burke admits that the Google “login audit” file produced by Google in  
18 response to subpoena does not contain Workspace deletion events and that the “Admin  
19 audit logs remain the authoritative source” for the actions she attributes to Mr. Angelone.  
20 She further acknowledges that the admin audit logs for the Workspace “have not been  
21 produced” to AONE or to Watts. Plaintiffs’ written responses to AONE’s RFPs directed at  
22 the native admin log export underlying Burke Exhibit 19 state that Plaintiffs have “no  
23 responsive unproduced documents” in their possession, custody, or control.

24 Given the transfer timeline above and FTI’s confirmation that Plaintiffs had full,  
25 exclusive control of the Workspace environment by October 11, 2022, Plaintiffs cannot  
26 credibly suggest they never had access to the very admin logs they now call  
27 “authoritative.”

28 **Meta/Facebook/Instagram and X/Twitter admin logs.**

AONE served RFPs requesting native Facebook Business Suite logs, Facebook Page logs, Instagram logs, and similar social-media account logs that would show any alleged changes in admins, passwords, or access. Plaintiffs again responded that they have no responsive unproduced documents, even though Ms. Burke's opinions about password resets, lockouts, and alleged tampering presuppose the existence of such logs.

**IP-correlation work product.**

Plaintiffs repeatedly assert that IP addresses such as 76.167.147.254 and 2603:8000:df00:988f:90b8:f0ce:ab97:3f8d identify Mr. Angelone or his residence, yet in response to RFPs seeking Cellebrite projects, analyst notes, or other forensic work tying those IPs to Angelone or "Jacky Jasper," they stated they have no responsive unproduced documents.

**Emails, texts, and messaging-app communications.**

Plaintiffs rely on snippets of emails and messaging-app communications embedded as PDFs or screenshots in Burke's exhibits (e.g., Exhibits 26–28 to her sanctions and summary-judgment declarations). When AONE requested native versions and complete threads (including .msg/.pst files), Plaintiffs stated they had no additional responsive materials beyond the clipped PDFs already filed. With respect to native iMessage threads between Roxanne Taylor and Angelone, Plaintiffs objected but produced no native text content at all.

Although Plaintiffs have filed static screenshots of the October 10 admin console page and similar images as court exhibits, they have never produced the underlying native admin-audit-log export on which Ms. Burke's opinions purport to rely, nor any native Google admin audit export for the new HEFG Workspace or for the social-media accounts they accuse AONE of tampering with. Under Rule 37(c)(1), Plaintiffs should be precluded from using at trial any log data, IP attribution, or communications that were not produced during discovery in native or complete form, as well as any expert opinions that assume the accuracy of those unproduced materials.

For screenshots or snippets that were never produced at all outside of being attached to a court filing—rather than in response to discovery—Rule 26(e) and Rule 37(c)(1) provide a straightforward bar: Plaintiffs cannot withhold documents during discovery and then spring those images at trial.

**B. The October 10, 2022 Admin Console Screenshot and IP Attribution Are Unreliable and Unduly Prejudicial (FRE 106, 401, 403, 702, 703, 901, 1002)**

Even apart from Rule 37, the October 10 admin console screenshot and associated IP-address attribution should be excluded because they are incomplete, ambiguous, and pose a serious risk of unfair prejudice and jury confusion.

**a. The screenshot is incomplete, ambiguous, and cannot be independently verified.**

On its face, the screenshot shows: (i) A Google Admin “Audit and investigation” page for [hiddenempirefilmgroup.com](http://hiddenempirefilmgroup.com) in the new HEFG Workspace; (ii) A series of user-level events for “[roxanne@hiddenempirefilmgroup.com](mailto:roxanne@hiddenempirefilmgroup.com)” on October 10–11, 2022, including “Roxanne Taylor logged in,” “Roxanne Taylor has changed Account password,” “Roxanne Taylor was presented with login verification,” “Roxanne Taylor failed to login,” and “Account [roxanne@hiddenempirefilmgroup.com](mailto:roxanne@hiddenempirefilmgroup.com) dis[abled]”; and (iii) An “IP” column in which some entries list an IPv6 address ending in “...ab97:3f8d.”

The log does not identify any acting admin user, does not show a “delete Workspace” event, and does not make clear that the account-disable event was executed from that IPv6 address. Nonetheless, Ms. Burke captions the figure “Angelone IP logged into HEFG Workspace and disabling R.A. Taylor’s account” and treats that caption as a key pillar of her attribution and spoliation theories.

Because Plaintiffs never produced the native admin-audit-log export for this Workspace, AONE cannot test (i) whether the screenshot was filtered or cropped; (ii) what other events occurred before and after the displayed entries; (iii) whether the IP column reflects the device initiating a login, a background system process, or some other context; or (iv) whether the screenshot truly comes from the same environment as the historical

1 Workspace tenant whose logs end on October 7, 2022, as opposed to the new Workspace  
2 Google created and placed under Plaintiffs' control during the FTI transfer process.  
3

4 Watts confirms that he was provided only the screenshot, and that "no documents or  
5 logs were provided in support of [Ms. Burke's] screenshot" for the new environment; he  
6 could not verify its provenance, completeness, or meaning. Under Rules 702 and 703,  
7 expert opinions must rest on "sufficient facts or data" and reliable methods. An opinion  
8 that extrapolates far-reaching conclusions from a single, unproduced screenshot—  
9 especially about who executed an admin-level action in a system Plaintiffs themselves  
controlled—is not reliably grounded.

10 Under Rule 106, Plaintiffs should not be allowed to present a cropped portion of a  
11 technical log as if it were the whole story while withholding the complete export that  
12 would show context. And under Rules 901, 1002, and 1003, because Plaintiffs never  
13 produced the underlying admin audit log and there is a genuine question whether the  
14 cropped screenshot fairly and completely reflects it, using the screenshot as a stand-in for  
15 the log raises serious authentication and best-evidence concerns.

16       **b. Any marginal probative value is substantially outweighed by  
17                  unfair prejudice and confusion.**

18 This Court has already denied Plaintiffs' motion for terminating sanctions after a  
19 full evidentiary hearing, finding the record insufficient to attribute Workspace deletion to  
20 Defendants or to support a terminating sanction, and crediting Watts's opinion that there is  
21 no direct log proof tying Angelone to any delete-Workspace event.

22 Allowing Plaintiffs to show the jury a cropped screenshot—captioned as "Angelone  
23 IP ... disabling R.A. Taylor's account"—when the underlying admin log has never been  
24 produced, and when the technical record distinguishes sharply between tenant-level  
25 deletion and user-level account actions, would (a) invite jurors to draw speculative and  
26 inflammatory inferences about "hacking," "deletion," and "spoliation" from ambiguous  
27 technical data no one can fully test or contextualize, (b) encourage Plaintiffs to relitigate  
28 their failed sanctions motion in front of the jury through a one-sided presentation of

1 unproduced logs, and (c) force the Court and jury into a collateral mini-trial over missing  
2 Google logs and unproduced forensic work product, contrary to Rule 403's directive to  
3 avoid undue delay and confusion.

4 Any marginal probative value of this static, incomplete screenshot is substantially  
5 outweighed by the danger of unfair prejudice, confusion of issues, and misleading the jury.  
6 It should be excluded under Rules 106 and 403, and any expert opinions that treat the  
7 screenshot as an accurate proxy for unproduced admin logs should be excluded under  
8 Rules 702 and 703.

9       **C. The Same Principles Apply to Unproduced Social-Media Logs,  
10 IP-Correlation Work, and Communications**

11 For the same reasons, Plaintiffs should be precluded from offering or referring to the  
12 following:

13       **(1) Meta/Facebook/Instagram and X/Twitter admin or Business Suite logs,  
14 or “log exports,”** that were never produced in discovery in native or complete form.  
15 Plaintiffs' own RFP responses admit they do not have any native Facebook Business Suite  
16 or Page logs for the HEFG-related pages, yet Ms. Burke's opinions about password resets,  
17 loss of access, and alleged tampering presuppose the existence of such logs.

18       **(2) Unproduced forensic IP-correlation work product** (Cellebrite projects,  
19 spreadsheets, analyst notes) that would be needed to support any attribution of particular  
20 IP addresses to Angelone or any alleged “alter-ego” accounts. Plaintiffs again admit they  
21 have no such materials. Allowing experts to allude to unseen “projects” or “analyst notes”  
22 would be the definition of trial by ambush and would leave AONE unable to test  
23 methodology or chain of custody.

24       **(3) Unproduced emails, texts, and messaging-app communications,** including  
25 partial screenshots or PDF excerpts that were never produced as complete, native threads  
26 with metadata, despite AONE's specific RFPs seeking those native versions and full  
27 threads. If Plaintiffs chose not to produce these communications in response to  
discovery—while relying on them in expert reports and declarations—they should not be

1 allowed to ambush AONE with them at trial. And even where a clipped screenshot itself  
2 was attached to a declaration or served as a PDF, Rules 106 and 403 bar Plaintiffs from  
3 cherry-picking selectively favorable fragments of a conversation while blocking  
4 production of the remainder.

5 (4) This Motion does not seek to exclude the actual third-party subpoena returns  
6 from Google, X/Twitter, Instagram, Namecheap, or Charter that were produced in  
7 discovery and are available to both sides. Rather, it asks the Court to enforce discovery  
8 fairness and evidentiary reliability by forbidding Plaintiffs from relying on unseen logs,  
9 partial screenshots, or undisclosed forensic work product as substitutes for the native  
10 records that would be required to properly substantiate their theories.

11 **IV. CONCLUSION**

12 For the foregoing reasons, AONE respectfully requests that the Court grant this  
13 Motion in Limine No. 3 and order that:

- 14 1. Plaintiffs, their counsel, and their witnesses are precluded from introducing into  
15 evidence, eliciting testimony about, or making any reference to Google Workspace  
16 admin audit logs for HEFG’s new Workspace, including any log entries  
17 corresponding to the October 10–11, 2022 events, to the extent those logs were not  
18 produced in discovery in native or complete form.
- 19 2. Plaintiffs, their counsel, and their witnesses are precluded from introducing,  
20 eliciting, or referring to the October 10, 2022 Google Admin console screenshot and  
21 associated IP-address attribution (including Exhibit 19 to Ms. Burke’s February 5,  
22 2024 sanctions declaration, Exhibit 19 to her June 9, 2025 summary-judgment  
23 declaration, any similar figures, and the caption “Angelone IP logged into HEFG  
24 Workspace and disabling R.A. Taylor’s account”) as substantive evidence that Mr.  
25 Angelone, or any device at his residence, deleted the HEFG Workspace tenant,  
26 destroyed historical HEFG data, or disabled Ms. Taylor’s account.
- 27 3. Plaintiffs, their counsel, and their witnesses are precluded from introducing or  
28 referring to any Meta/Facebook/Instagram or X/Twitter admin logs, Business Suite

1 logs, or other log exports that were not produced in discovery in native or complete  
2 form, including any such materials that appear only as cropped screenshots, charts,  
3 or summaries in expert reports or declarations.

4

5 4. Plaintiffs, their counsel, and their witnesses are precluded from introducing or  
6 referring to any Cellebrite projects, spreadsheets, analyst notes, or other forensic  
7 work product purporting to correlate IP addresses to Mr. Angelone, “Jacky Jasper,”  
8 or any “Icelandic Domains,” to the extent those materials were not produced in  
9 discovery.

10 5. Plaintiffs, their counsel, and their witnesses are precluded from introducing or  
11 referring to any emails, text messages, or messaging-app communications that were  
12 not produced during discovery or disclosed under Rule 26 as complete threads or  
13 native ESI despite specific RFPs seeking those native versions and full threads,  
14 including any partial screenshots or excerpts of such communications that appear  
15 only as exhibits to declarations (expert or non-expert) and were not produced as  
16 complete threads or native ESI.

17 6. Nothing in this Order shall limit AONE’s ability to cross-examine Plaintiffs’  
18 witnesses or experts using documents that were produced in discovery or admitted  
19 into evidence, including third-party subpoena returns and the Court’s prior orders,  
20 nor shall it prevent AONE from using any Plaintiffs’ unproduced materials if the  
21 Court permits such materials to be used for impeachment or another limited,  
22 non-substantive purpose.

23 **Dated: December 1, 2025**

24 **LAW OFFICES OF J.T. FOX,**  
**A Professional Corporation**

25 By:



26 J.T. Fox, Esq.

27 Attorney for Defendants and

28 Counterclaimants, DARRICK

ANGELONE; AONE CREATIVE, LLC,  
AND ON CHAIN INNOVATIONS, LLC

1  
2                   **CERTIFICATE OF SERVICE**  
3

4                   I am employed in Los Angeles County, California. I am over the age of 18  
5 and not a party to this action; my business address is 556 S. Fair Oaks Ave, No. 444,  
6 Pasadena, CA 91105. My email address is [justin@jtfoxlaw.com](mailto:justin@jtfoxlaw.com).  
7  
8

9                   I certify that on December 1, 2025, I served: **DEFENDANTS' MOTION**  
10                 **IN LIMINE #3 TO PRECLUDE UNPRODUCED DIGITAL AUDIT LOGS,**  
11                 **SCREENSHOTS, AND RELATED IP DATA** on the following parties or  
12                 counsel of record as follows:  
13

Felton T. Newell, Esq. Newell Law Group PC 1801 Century Park East, 24 <sup>th</sup> Floor Phone (310) 556-9663 E-mail: <a href="mailto:felton@newellpc.com">felton@newellpc.com</a> ; <a href="mailto:christine@newellpc.com">christine@newellpc.com</a>	<i>Counsel for Plaintiffs</i>
Jeffrey S. Kramer, State Bar No. 094049 Sandra Calin, State Bar No. 100444 KRAMER, DEBOER & KEANE A Limited Liability Partnership Including Professional Corporations 27001 Agoura Road, Suite 350 Calabasas, California 91301 Tel: (818) 657-0255 - Fax: (818) 657-0256 <a href="mailto:jkramer@kdeklaw.com">jkramer@kdeklaw.com</a> ; <a href="mailto:scalin@kdeklaw.com">scalin@kdeklaw.com</a>	<i>Co-Counsel for Defendants</i>

21                   By ECF/CM: I electronically filed an accurate copy using the Court's  
22 Electronic Court Filing ("ECF") System and service was completed by electronic  
23 means by transmittal of a Notice of Electronic Filing on the registered participants  
24 of the ECF System.

25                   I declare under penalty of perjury under the laws of the United States of  
26 America and the State of California that the foregoing is true and correct. Executed  
27 at Pasadena, California on December 1, 2025.

28                   \_\_\_\_\_  
29                   /s/Justin Kian  
30                   Justin Kian